

# Contractor Privacy Notice

## Purpose and general information

This privacy notice provides information to you, as a contractor under our 'Tilhill Contractor Conditions of Contract' (SF/131), on the personal data we collect and process about you and the people who work for you during and after your working relationship with us. It is important that you read this privacy notice, so that you are aware of how and why we are using such information and your rights.

For all our activities, the data controller – the company that is responsible for personal data – is Tilhill Forestry Limited.

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing any questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, you can contact the DPO using the details set out below. This privacy notice supplements other privacy notices and is not intended to override them.

## What personal data do we collect?

We collect the following information about you and others who may work for you:

- names, title, address and contact details, including personal email address and telephone number, date of birth and gender;
- details of qualifications, training, skills, licences, experience and employment;
- information on accidents and incidents you or your workers may be involved with while working for us;
- details of your bank account;
- information about your emergency contacts;
- photographs;
- information about your use of our information and communications systems;
- information on your schedule (days of work and working hours), location of your workplace;
- details of any grievance procedures, complaints or concerns in which you have been involved, including any warnings issued to you and related correspondence; and
- assessments of your performance, and ratings and any related correspondence.

## How is your personal data collected?

We collect the above information in a variety of ways. For example, data might be collected through the contractor assessment and approval process where you provide us with this information in order to demonstrate the capacity and competency to deliver the work we require. Once you are working for us as an approved contractor data may also be collected in advance of a new work activity starting or on the worksite by managers or at other meetings or as part of our working relationship.

In some cases, we may collect personal data about you from third parties, such as references supplied by former employers and information from employment background check providers.

## **Why do we process personal data?**

We only process your personal data when the law allows us to. Most commonly, we will process your personal data in the following circumstances (which are identified by the relevant number of asterisks alongside the practical uses below):

1. Where we need it to perform the contract we have entered into with you;
2. Where we need to comply with a legal obligation;
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

In particular, we require this information for the following reasons:

1. Confirmation of organisational capacity and individual operative or machine operator's competence;
2. To provide payment for your services;
3. Provide our clients with evidence of organisational and individual operative or machine operator's competence prior to commencing work;
4. To providing you with information and opportunity to ensure your health and safety in the workplace, assess your fitness to work under contract with us.

## **Change of purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

We do not use this information for marketing or provide this information to any other third parties except for our Clients to confirm capacity and competence of organisations or individuals to work on specific contracts, or to Regulators where we may be required to comply with a legal obligation.

## **Security**

We are committed to ensuring that your information is secure. To prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we hold. We will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **Controlling your personal information**

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so.

We may use your personal information to send you information on Safety & Assurance matters which we need you to be aware of, and understand, as part of the service you provide to us.

If you believe that any information we are holding on you is incorrect or incomplete, or you change your mind about us holding information on you; please write to, or email us, as soon as possible. We will promptly correct any information found to be incorrect. We will also remove the

information we hold on you on request where this doesn't affect the lawfulness of processing based on the consent before its withdrawal.

### **How long will we keep your data?**

We only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a worker or contractor of the company we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

### **Your rights and withdrawing consent**

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require us to change incorrect or incomplete data;
- require us to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing and there is no other basis for processing; and
- object to the processing of your data where we are relying on its legitimate interests as the legal ground for processing.

If you would like to request details of personal information which we hold about you or would like to exercise any of your rights, please contact the Head of Safety & Assurance, Tilhill, Kings Park House, Laurelhill Business Park, Stirling, FK7 9NS or email [gdprequiries@tilhill.com](mailto:gdprequiries@tilhill.com).

If you believe that we have not complied with your data protection rights, you can complain to the Information Commissioner.

### **Changes to the Privacy Notice**

We may change this privacy notice from time to time to reflect how we are processing your data. If we make significant changes, we will make this clear on our website or by other means of contact such as email, so that you are able to review the changes. The date that the privacy notice was last updated and historic versions can be obtained by contacting us.